REMARKS

The above amendment and these remarks are responsive to the Office action of 3 Aug 2004 of Examiner Sathyanaraya R. Pannalla.

Claims 1-16 are in the case, none as yet allowed.

Drawings

The amendments proposed by applicants to the drawing Figures 3, 15, 16, and 17 filed on 4/19/2004 have been approved by the Examiner. Corrected drawings have been ordered and will be forwarded to the Commissioner as soon as available.

Specification

The specification has been objected to for the use of the trademark EDI at page 43, line 18.

Applicants have amended the specification and claims to remove references to EDI, replacing it with "electronic data interchange (EDI)" wherever found, making clear that it is used as an acronym. The term "electronic data interchange" is abbreviated in the art as EDI, which is used in the original specification at page 43, line 18. See McDaniel, George, Ed. <u>IBM Dictionary of Computing</u>, McGraw-Hill, Inc., New York, 10th Ed. Aug. 1993. vii, 228. McDaniel states at page 228 "EDI Electronic data interchange. (T)", where the T indicates (at page vii) that the source of the acronym is working papers being developed by ISO/IEC JTC1/SC1. See also, Wiecha, U.S. Patent 5,870,717 (cited by the Examiner in the present case), which further clarifies that the term EDI is well known in the art, stating at Col. 14, lines 58-63:

> "The Electronic Data Interchange (EDI) is a standard for the exchange of business data. It defines: Communication wrappers, which are usually handled by a communication package from a Value Added Network (VAN) providing EDI mailboxes...."

35 U.S.C. 112

Claims 1 and 11 have been rejected under 35 U.S.C. 112, second paragraph, with the statement, "Applicant need[s] to correlate terms used in the amended claims with respect to the specification." The Examiner has not specified which terms are objectionable. In claims 1 and 11 the only terms added by the amendment were:

"electronic data interchange"

> This term is abbreviated in the art as EDI, which is used in the original specification at page 43, line 18. See McDaniel, George, Ed. <u>IBM Dictionary of Computing</u>, McGraw-Hill, Inc., New York, 10th Ed. Aug. 1993. vii, 228. McDaniel states at page 228 "EDI Electronic data interchange. (T)", where the T indicates (at page vii) that the source of the acronym is working papers being developed by ISO/IEC JTC1/SC1.

"relational database"

This term is used throughout the original specification. See for example page 16, line 3.

Claims 5, 8, and 13 have been rejected under 35 U.S.C. 112 for improper use of trademarks.

Applicants have not used the term "EDI" as a trademark, but have used it as an acronym meaning "electronic data interchange" which those of skill in the art will recognize refers to electronic data interchange as that term is used in the draft ISO specifications such as that referred to above by McDaniel and Wiecha. Applicants have amended claims 5, 8, and 13 to replace the use of EDI with "electronic data interchange".

Applicants urge that the rejection of claims 1, 5, 8, 11, and 13 under 35 U.S.C. 112 be withdrawn.

35 U.S.C. 103

Claims 1, 11 have been rejected under 35 U.S.C. 103(a) over Wiecha (US Patent 5,870,717) in view of Abrams (US Patent 6,151,608).

Claims 2-10, 12-16 have been rejected under 35 U.S.C.
103(a) over Wiecha in view of Anderson (US Patent
6,360,211).

Applicants traverse the rejections under 35 U.S.C. 103,
and argue that the Examiner has not established a prima
facie case of obviousness, the legal basis for which was set
forth in the prior Amendment.

Applicants argue that when the claims are properly
understood, and the references properly applied, the
required prima facie case is not made.

Claims 1 and 11

With respect to claims 1 and 11, applicants note that
the Weicha invention encompasses the scope of loading a
catalog EDI into a DB2 table to be used by an online
ordering system.

Applicants' invention as set forth in these claims,
however, goes beyond that, delving specifically into the
ability to load that catalog into a staging area and
allowing certain special users access to make carefully

controlled changes to that data. In applicants invention, not all of the data is changeable, the structure of the staging table and the surrounding system actually controls what can be changed once the vendor has supplied the information. Applicants invention does receive a file from a supplier via EDI. However, the distinction with respect to Weicha and Abrams lies in what applications do with it. Claim 1 is set forth and analyzed as follows, which analysis also applies to claim 11:

1. **A method for publishing a catalog <u>as a relational database production table</u>, comprising the steps of:**

> **receiving from a supplier <u>by</u> electronic data interchange a flat file catalog;**

>> The Examiner cites Wiecha Fig. 1, 6, col. 3, lines 10-17, lines 59-61, and col. 14, lines 59-60. Applicants demur.

> **loading said <u>flat file</u> catalog into a relational database staging table;**

>> The Examiner states: "Wiecha teaches updating

relational database tables but does not teach

explicitly loading data into relational database

tables." The Examiner then cites Abrams, Fig. 4,

col. 12, lines 6-22.

"There are two approaches to loading the data
into a temporary table depending on whether
the source data is in an ASCII file or
whether it resides in another Oracle table.
For data originating from a non-Oracle
source, the invention provides a format for
an ASCII file into which the user can extract
data from a non-Oracle source and use
SQL*Loader to insert the data into an Oracle
temporary table. Before this invention, the
user had to write validations, translations,
and change the format of the data as part of
coding the SQL*Loader script. Using the
invention, however, the user only needs to
create an extract table and dump it into the
temporary Oracle table. For source data
orginating in an Oracle table, the invention
uses an automatic upload process to load the
source table to the temporary table. The
format and characteristics of the data in the
temporary table do not matter since the
invention will later reformat the data to fit
into the destination table." (Col. 12, lines
6-22.)

Applicants traverse the Examiner's reading of

Abrams on the claim, noting that Abrams is loading

data from a supplier into a temporary table, whose

format is unimportant. In applicants case, as is

stated later in this claim, the format of the

staging table is very important: it matches that

of the production table. Abrams also indicates

that the only purpose of the temporary table is to
allow mapping programs to then move the data into
the production table. The purpose of the staging
table in applicants invention is to allow manual
intervention, update and validation before the
data is moved into the production version of the
table.

**allowing buyer audit control over selected fields in
[[the]] <u>said</u> staging table ~~catalog~~ while restricting
buyer access to other fields;**

The Examiner cites Wiecha Fig. 12, col. 9, lines
2-10. Wiecha teaches:

> "This function [Order Manager and Catalog
> Browser] runs on the end-user's personal
> computer... It provides the following main
> function to an employee using the system..."
> (Col. 8, lines 25-29)
>
> "Product Clip Board
>
> > "Select items on Product Listing for
> > adding to clipboard.
> > "Add item on Product Page to clipboard.
> > "Delete an item in the clipboard.
> > "Change the quantity of an item in the
> > clipboard.
> > "Change the quantity of an item in the
> > clipboard.
> > "Clear the clipboard to remove ALL
> > items.

> "Save the clipboard (to a file).
> "Submit the clipboard (as a purchase
> request).
> "Show the items on the clipboard.
> "View clipboards (i.e. saved clipboard
> files). (Col. 9, lines 1-10).

Applicants traverse this reading of Wiecha. Here,
Wiecha is describing the activities of an employee
user, not those of a "buyer", as applicants claim.
There is no teaching here or elsewhere in Wiecha
of allowing a <u>buyer</u> edit access to selected fields
in a staging table catalog and restricting access
to other fields. As is clearly set forth in the
preamble of claim 1, applicants are here claiming
the publication (that is, creation) of the
catalog, not just its use, as is being described
by Wiecha. Applicants' specification renders this
claim clear on this point: the claimed "buyer" is
not the "requester" or, as the Examiner's citation
of Wiecha is teaching, the "user". Thus,

> "In building a requisition catalog for a
> large enterprise with many suppliers, an
> automated process is needed to receive a flat
> file from a supplier for review <u>by a buyer</u>
> <u>before being externalized for use by</u>
> <u>requesters</u>. While the buyer must be able to
> review the contents, he must be restricted
> from making changes to certain sensitive
> fields, such as changing a unit price or a
> unit of measure, both of which could

constitute fraud. Consequently, allowing the buyer to edit the flat file can't provide the level of security required. There is a need in the art to provide <u>a buyer</u> a means of auditing catalog content before externalizing it to production for access by <u>requesters</u>." (Specification, page 4.)

"Referring to Figure 15, a system architecture for implementing catalog administration includes a <u>requester</u> browser 410, a <u>buyer</u> browser 412, with net.data connections 391 and 393 to a dedicated DB2 server and DB2 database 390 having a staging table 392 and a production table 394 through network dispatcher 102 and Go cluster 104...

"A <u>buyer</u> 412 accesses staging table 392 via net.data connection 391, and a <u>requestor</u> 410 accesses the production 394 table via net.data connection 393. This connection 391, 393 is implemented as a single path, and the requester and buyer provided different levels of authority to access different tables 392, 394 in DB2 390 over that same path. <u>Buyer</u> 412 can change selected fields in the staging table 392 and can update production table 394 from staging table 392. <u>Requester</u> 410 can only view (not change) the production table 394...

"In operation, catalog flat file 314 is received by application server 114 through firewall 380 via EDI and loaded into DB2 database 390 by application program 384. Catalog administration function 386 [provides] specific users 400 audit control over certain fields in staging table 392, and publishes the catalog data to the live, or production, system 394. Function 386 presents to <u>buyer</u> 400 a staging table 392 with a GUI front end, with selected fields enable and other fields not enabled to be personalized.

"Catalog file 314 is a flat file containing catalog items in a column delimited format specified to supplier 300

by the enterprise.

"Application server 114 manages database
390 containing staging table 392 and
production table 394. A catalog file 314
comes to application server 114, which
includes a program 384 for moving data from
that flat file to staging table 392. See
Table 7.

"A <u>buyer</u> at terminal 400 accesses the
staging table 392 on the web 396. He views
catalog items and enters transactions with
action button which transfers information
from staging table 392 to production table
394. Production table 394 is referenced by
req cat web 388, and staging table 392 is
referenced by the catalog administration
function 386 operated by the <u>buyer</u> 400.
<u>Typically, a buyer is member of procurement
organization with responsibility for,
negotiating deals with suppliers. A
requester 402 accesses production table 394
over web 398 to create and submit a
requisition to SAP 382.</u> (Specification,
pages 40-42, emphasis added.)

updating a relational database production table from

said [[a]] relational database staging table, said

staging table and said production table having matching

formats; and

The Examiner cites Wiecha, Fig. 11, col. 7, lines

8, which states:

"Distribution Manager Responsible for...

Update DB2/2 Tables."

Applicants traverse this reading of Wiecha. There
is no teaching here of updating a relational
database production table from a relational
database staging table. As claimed, the staging
table is one into which a flat file customer
catalog has been loaded, and to which the <u>buyer</u>
has access to certain fields and no access to
others.

**allowing a user read access to said relational database
production table.**

The Examiner cites Wiecha, col. 9, lines 25-29,
which states:

> "Print Clipboard: This function is in
> addition to, and separate from, the report
> generation functions which use DB2/2 report
> generators. It enables users without access
> to DB2/2 to print a clipboard or submitted
> order from their own workstations."

Applicants demur.

Claim 2

With respect to claim 2, Weicha is not clear about the
extent of his catalog maintenance functions. It appears
that catalogs can be grouped. Applicants invention controls
access to specific catalogs by specific personnel, controls
changes to the data sent by the vendor, and protects some
data sent by the vendor from being changed. Anderson speaks
only of saving data (in this case, invoice data) from a flat
file into an intermediary database. There is no mention
made of data manipulation that is made to it while it is
there, or how changes to that data are controlled.

Applicants' claim 2 states:

2.   [Original] A requisition catalog administration method
for providing control, audit, and publishing procedures for
flat files received from suppliers, comprising the steps of:

receiving a catalog flat file from a supplier;

The Examiner refers to Wiecha, Fig. 1, 6, col. 3,
lines 10-17, lines 59-61 and col. 14, lines 59-60.
As with claim 1, applicants demur.

converting said flat file into a staging table having

access control list controls over fields within said

staging table;

The Examiner cites Wiecha at Fig. 12, col. 9,

lines 2-10, col. 8, lines 35-36, which with the

introductory material at col. 8, lines 25-29)

states:

"This function [Order Manager and Catalog
Browser] runs on the end-user's personal
computer... It provides the following main
function to an employee using the system..."
(Col. 8, lines 25-29).

"Additional Order Manager functions may be
enabled or disabled based on the login
profile." (Col. 8, lines 35-36).

"Product Clip Board

"Select items on Product Listing for
adding to clipboard.
"Add item on Product Page to clipboard.
"Delete an item in the clipboard.
"Change the quantity of an item in the
clipboard.
"Change the quantity of an item in the
clipboard.
"Clear the clipboard to remove ALL
items.
"Save the clipboard (to a file).
"Submit the clipboard (as a purchase
request).
"Show the items on the clipboard.
"View clipboards (i.e. saved clipboard
files). (Col. 9, lines 1-10).

Applicants traverse the Examiner's reading of

Wiecha. That is, Wiecha is silent on the concept

of access control list controls over fields within

a staging table, referring only to a login profile

-- which is not an access control list on fields

as applicants claim. Applicants teach what an

access control list is in their specification, as

follows:

> "A requisition catalog for use in a web
> environment requires a very large database,
> such as an IBM DB2 database, and the
> functionality provided by, for example, a
> Lotus Notes server. However, a Lotus Notes
> access control list (ACL) can not be used
> control access to an IBM DB2 database, and
> the privileges on a DB2 table can be granted
> only by the table instance owner.
> Additionally, since Notes agents which access
> DB2 are running from a Notes server, the
> Notes server ID often has full access to all
> tables, and there is no way to limit that.
> That is, in a hybrid (Notes/DB2) environment,
> the user ID which accesses DB2 tables is the
> ID of the Notes server. Therefore, can't
> restrict access by a user to the DB2 tables.
> There is a need in the art for a system and
> method which allows certain users access to
> certain data in certain selected tables.
> That is, there is needed a system and method
> for providing very flexible access to DB2
> tables without requiring database
> administrator (DBA) involvement to issue
> grants against the tables, and bypassing the
> problem caused by Notes agents all coming
> from the same user (the Notes server ID)."
> (Specification, page 5.)

> "Everything in Lotus Notes, even code,

is in documents which require access control
list (ACL) controls on access. Consequently,
the preferred embodiment of the invention
uses Notes ACLs to access code. However,
when accessing data, a role table 420 (see
Figure 19) is used to build roles and
permissions, and an object model is provided
to generically access data from database 210,
thus extending Notes to access a non-Notes
data source 210. In order to configure DB2
to work in a Notes application environment, a
single sign off is provided after getting
through Notes code ACLs. This does not
involve use of any of DB2's role tables and
grants, but rather a single web ID 434 known
to the Notes code to access the DB2 data."
(Specification, page 47.)

**controlling through a graphical user interface edit
access authority to said staging table and through said
access control list access to fields within said
staging table;**

The Examiner cites Wiecha Fig. 12, col. 9, lines
2-10, and col. 8, lines 35-36. These are set
forth above with respect to the previous claim
clause.

Applicants traverse. Wiecha speaks only of a log
in profile, and has nothing to teach about edit
access authority to a staging table together with
access control list access to fields within the
staging table.

responsive to input from a buyer granted access control list access to selected field in said staging table, updating said selected fields; and

The Examiner cites Wiecha Fig. 11, col. 7, line 8, which states:

"Update Db2/2 Tables."

Applicants traverse. Wiecha does not teach a staging table upon which access control list control of access to selected fields is provided.

responsive to buyer command, updating a production catalog with said staging table for read access by users in creating requisitions against said catalog.

The Examiner cites Wiecha, Fig. 11, col. 6, line 29 to col. 7, line 8. Applicants traverse. Again, Wiecha does not teach a staging table having the characteristics recited previously in this claim.

With respect to claim 3, Weicha is vague in describing the extent of control which the system has over the administrators. The administration function which he describes in Col. 12, lines 16-23 involves maintenance of EDI vendor information, not of the content of the catalog from the vendor. Col. 5, lines 34-47 describe manipulation of images and text, but no controls over what can be modified and what is protected. Anderson does teach storing flat file data into a database table, but again, there is no mention of data manipulation that is made to it or how changes to that data are controlled.

Applicants claim 3:

3.   [Currently amended] **System for building and using a web catalog, comprising:**

a supplier catalog flat file for storing catalog items in an enterprise defined format;

The Examiner cites Wiecha Fig. 1, 6, col. 3, lines 10-17, lines 59-61 and col. 14, lines 59-60.

Applicants demur.

a database including a staging table and a production table;

The Examiner cites Anderson Fig. 1, 4, col. 3, lines 30 and col. 18, lines 46-51, which state:

> "Invoice collector 48 extracts the invoice information from the flat file and stores the information in an intermediary database 66 via a communication path 65, e.g., the internal bus of a mainframe." (Anderson, col. 3, lines 28-31.)

> "In a second embodiment, the present invention employs a non-distributed architecture, in which the intermediary database 66, customer databases 86, communication paths 68, 82 and 85, and communications interfaces 80 and 84 of Fig. 1 are replaced with a single centralized database 104, as depicted in Fig. 4." (Anderson, col. 18, lines 46-51.)

Applicants traverse. While intermediary database 66 may be considered a staging table, it does not have the characteristics of a staging table set forth later in the claim.

an application server for receiving, converting and storing said flat file to said staging table;

The Examiner cites Anderson Fig. 3, col. 17, lines 66-67, which states: "Middleware server 114 is connected to mainframe 110." Applicants travers, noting that the citation from Anderson is silent as to the operation of middleware server 114, only stating that it is connected to mainframe 110.

an administration function <u>for controlling content of catalog information from a vendor stored to said staging table from said flat file</u>;

The Examiner cites Wiecha Fig. 7, col. 12, lines 16-23, which states "This is to enable the purchasing administrator to maintain the EDI vendor addresses for confirmation of shipment and billing, as well as status updates. The supported functions include..." Applicants agree that Wiecha has an administration function, but not one which controls content stored to the staging table from the flat file.

a catalog administration procedure for presenting said staging table to said catalog administration function in a graphical user interface with fields of said

staging table selectively enabled or disabled for

auditing in accordance with the role and authority of a

user of said administration function;

The Examiner cites Wiecha Fig. 7, col. 11, line 4,

which states: "Order Manager Administration".

Applicants traverse, noting that here Wiecha

teaches nothing about presenting a staging table

in a GUI with fields selectively enabled or

disabled as recited in the claim.

and for publishing an administration audited

catalog to said production table;

The Examiner cites Wiecha Fig. 8, col. 5,

lines 34-47. Applicants demur.

a requisition creation function operable by a user for

creating a requisition with reference to said

production table; and

The Examiner cites Wiecha Fig. 3-4, col. 3, lines

10-47. Applicants demur.

a web catalog function for presenting said production

table to said requisition creation function.

The Examiner cites Wiecha Fig. 3, col. 3, lines

10-13. Applicants demur.

Claims 4-7

These claims 4-7 all depend from claim 3, and are

distinguished from Wiecha and Anderson as discussed above

with respect to claim 3.

Further with respect to claim 4, in Anderson, ACH PPD

is a type of invoice information, not a flat file format.

See Col. 3, lines 16-20.

Further with respect to claim 5, applicants again note

that Anderson does not have a Col. 23. Applicants request

that the Examiner identify the teaching on which he relies.

Claim 8

With respect to claim 8, Weicha's reference at Col. 3,

lines 10-18 is of the end user accessing the catalog from

the production tables, not of the administrator (that is,

applicants "buyer") accessing and modifying (in a controlled

manner, that is, enabling change to selected fields) the

catalog while still in the staging tables. Applicants claim

8 states:

> "presenting a graphical user interface to said buyer
>
> containing said catalog data and enabling said buyer to
>
> change selected fields of data in said staging
>
> table..."

As previously discussed with respect to claim 1, applicants'

"buyer" is not the end user, or Wiecha's "employee".

Further, Weicha's reference at Col. 2, lines 4-19 does

not indicate, as applicants claim, that the buyer

(administrator) actually controls when the data is moved

from the staging area into the production area, where it

then becomes accessible to the end users for creating

requisitions.

Claims 9-10

Claims 9 and 10 depend from claim 8, and are

distinguished from Weicha (and Anderson) as previously described.

Further with respect to claim 9, Weicha is describing purchase order change and purchase order cancel EDI transactions. Applicants invention involves automatic electronic notification to the supplier when the catalog data provided is in an improper format, or when for some other reason it fails to load to the staging table.

Further with respect to claim 10, Weicha is describing the user's ability to update a purchase order. This is not the same as in applicants invention, which provides an administrative user (buyer) a level of authority to be granted to him that allows him to modify certain attributes of the catalog data.

Claims 12 and 14

Claims 12 and 14 are similar in scope to claim 1, and are distinguished from Wiecha as previously discussed with respect to claim 1. Specifically, with respect to claims 12 and 14, Wiecha's teachings at Col. 9, lines 2-10 and Col. 8, lines 35-36, relate to the end user ordering from the

catalog, not to the administrator (buyer) accessing the staging table.

Claim 13

Claim 13 is similar in scope to claim 8, and is distinguished from Wiecha as previously discussed with respect to claim 8. Specifically, Wiecha's reference at Col. 3, lines 10-18 is of the end user accessing the catalog from the production tables, not of the administrator accessing and modifying (in a controlled manner) the catalog while still in the staging tables. Wiecha's reference at Col. 2, lines 4-19 do not indicate that the buyer (administrator) actually controls when the data is moved from the staging area into the production area, where it then becomes accessible to the end users for creating requisitions. Further, with respect to claims 13 and 14, in Anderson, ACH PPD is a type of invoice information, not a flat file format. See Col. 3, lines 16-20.

Claims 15-16

Claims 15 and 16 depend from claim 13, are similar in scope to claims 9 and 10 and are distinguished from Wiecha

as discussed with respect to claim 9, 10, and 13.

SUMMARY AND CONCLUSION

Applicants urge that the above amendments be entered
and the case passed to issue with claims 1-16.

The Application is believed to be in condition for
allowance and such action by the Examiner is urged. Should
differences remain, however, which do not place one/more of
the remaining claims in condition for allowance, the
Examiner is requested to phone the undersigned at the number
provided below for the purpose of providing constructive
assistance and suggestions in accordance with M.P.E.P.
Sections 707.02(j) and 707.03 in order that allowable claims
can be presented, thereby placing the Application in
condition for allowance without further proceedings being

necessary.

Sincerely,

D. G. Ruest, et al.

By

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